

REMARKS

The Examiner is thanked for the performance of a thorough search. By this response, Claims 1–4, 12, 13, 15–26, 34, 35, 55–57 have been amended. Claims 58–61 have been added. No claims have been canceled. Hence, Claims 1–61 are pending in this application. Of the pending claims, Claims 37–54 are withdrawn.

All issues raised in the Office Action are addressed hereinafter.

I. ALLOWABILITY OF CLAIM 56

The Examiner is thanked for indicating that Claim 56 would be allowable if rewritten in independent form. At this time, however, Applicants decline Examiner's invitation to rewrite Claim 56. Applicants submit that the rejection of Claim 4, upon which Claim 56 depends, is overcome by the present amendments and remarks. Therefore, the objection as to Claim 56 is moot. Reconsideration of the objection is respectfully requested.

II. CLAIM REJECTIONS BASED ON 35 U.S.C. § 102

Claims 1–36 are rejected under 35 U.S.C. § 102(e) as allegedly anticipated by US 2004/0031030 A1 to Kidder (hereinafter "*Kidder*"). Applicants traverse the rejection. Reconsideration is respectfully requested.

CLAIM 1

Claim 1 presently recites, among other elements:

querying the router to determine a plurality of functional areas
supported by the router;
receiving, from the router, data indicating the plurality of
functional areas supported by the router;
generating and displaying a plurality of user interface objects on a
graphical user interface, wherein each user interface object
from the plurality of user interface objects corresponds to
configuration data for one of the plurality of functional
areas supported by the router;

wherein generating and displaying the plurality of user interface objects further comprises, based on the data indicating the plurality of functional areas supported by the router, determining which user interface objects to generate and display;

Among other purposes, the recited method of Claim 1 facilitates the **dynamic generation of graphical user interfaces for configuring functional areas of a router, without first knowing which functional areas are supported by that router.** Because a device implementing the method of Claim 1 does not know which functional areas are supported by the router, Claim 1 recites certain steps that may be performed to ascertain which functional areas are supported. These steps include “querying the router,” and “receiving, from the router, data indicating the plurality of functional areas supported by the router.” Moreover, a device implementing Claim 1 must then determine which user interfaces to display based on the received data.

By contrast, *Kidder* discloses a hard-coded graphical user interface, incapable of dynamically adapting to a router based on which functional areas are supported by that router. Rather, *Kidder*’s user interface presents a **static “interpretation” of status information for each of the ISO’s five pre-defined functional areas** of network management: Fault, Configuration, Accounting, Performance, and Security (FCAPS). *Kidder* at ¶¶ [0109], [0229], [0234]–[0237]. Aside from the fact that only one of these pre-defined areas, the Configuration area, pertains to configuration data, *Kidder* fails to teach or suggest generating user interfaces for dynamically determined functional areas.

Accordingly, *Kidder* fails to disclose at least the following features of Claim 1: **“querying the router to determine a plurality of functional areas supported by the router,” “receiving, from the router, data indicating the plurality of functional areas supported by the router,” and “based on the data indicating the plurality of functional areas supported by the router, determining which user interface objects to generate and display.”**

Nonetheless, the Office Action alleges that *Kidder* teaches a step of “querying the router to determine a plurality of functional areas supported by the router” in paragraphs [0109], [0155], and [0163]–[0195]. The Office Action is mistaken. None of these paragraphs teach such a step.

Paragraph [0109], for instance, teaches that *Kidder*'s Network Management System (NMS) collects and allows modification of configuration data from multiple network devices. In no way does paragraph [0109] teach or suggest that any of these network devices is ever "quer[ie]d . . . to determine a plurality of functional areas supported by the router." Rather, *Kidder*'s NMS appears to already know which functional areas may be configured for the multiple network devices.

Regarding paragraph [0155], *Kidder* discloses that the NMS server may connect to and retrieve configuration data from a network device. However, this paragraph is likewise silent as to "querying the router **to determine a plurality of functional areas supported by the router.**"

With respect to paragraphs [0163]–[0195], *Kidder* teaches that the NMS may feature a variety of different interfaces for modifying configuration data. However, at no point does *Kidder* ever teach or suggest that these interfaces are determined dynamically, by "querying the router to determine a plurality of functional areas supported by the router."

Moreover, none of the cited paragraphs teaches or suggests "**receiving, from the router, data indicating the plurality of functional areas supported by the router.**" Nor do the cited paragraphs teach or suggest that the NMS, "based on the data indicating the plurality of functional areas supported by the router, **determine[es] which user interface objects to generate and display.**"

For at least these reasons, *Kidder* fails to teach or suggest at least one limitation of Claim 1. Therefore, *Kidder* does not anticipate Claim 1 under 35 U.S.C. § 102. Reconsideration is respectfully requested.

CLAIMS 2 AND 3

Independent Claims 2 and 3 also recite the features quoted for Claim 1, although Claims 2 and 3 are expressed in another format. Claims 2 and 3 have all the features described above for Claim 1, and therefore Claims 2 and 3 are allowable over *Kidder* for the same reasons given above for Claim 1. Reconsideration is respectfully requested.

CLAIM 4

The method recited in Claim 4, while similar to Claim 1 in that, among other purposes, the method facilitates dynamic generation of graphical user interfaces for configuring functional areas of a router, features somewhat different steps than those of Claim 1. However, for reasons similar to those described with respect to Claim 1, *Kidder* fails to disclose a method such as that recited in Claim 4.

For example, Claim 4 recites the step of “determining which of a plurality of functional areas are supported by a network device.” *Kidder* does not teach such a step. *Kidder* does not, for instance, teach that a number of different functional areas exist, each of which may or may not be supported by a network device. Rather, *Kidder* teaches that each of five different functional areas exists for each device. Nor does *Kidder* teach making a determination as to which functional areas are supported for a network device.

For at least the above reasons, *Kidder* fails to teach or suggest at least one limitation of Claim 4. Therefore, *Kidder* does not anticipate Claim 4 under 35 U.S.C. § 102. Reconsideration is respectfully requested.

CLAIMS 15 AND 26

Independent Claims 15 and 26 recite the same features as Claim 4, although Claims 15 and 26 are expressed in another format. Claims 15 and 26 have all the features described above for Claim 4, and therefore Claims 15 and 26 are allowable over *Kidder* for the same reasons given above for Claim 4. Reconsideration is respectfully requested.

CLAIMS 5–14, 16–25, AND 27–36

Claims 5–14, 16–25, and 27–36 depend from Claims 4, 15, and 26, respectively, and include each of the above-quoted features by dependency. Thus, *Kidder* also lacks at least one feature found in Claims 5–14, 16–25, and 27–36. Therefore, *Kidder* does not anticipate Claims 5–14, 16–25, and 27–36. Reconsideration of the rejection is respectfully requested.

In addition, each of Claims 5–14, 16–25, and 27–36 recites at least one feature that independently renders it patentable. For example, **Claim 7** recites “the machine-implemented step of launching one or more of a plurality of application programs to allow the user to modify the configuration data.” For instance, a user might click on a button for a particular user

interface object. In response, a client implementing the steps of Claim 7 might automatically launch an external editing program that allows the user to modify the configuration data associated with the user interface object.

The Office Action alleges that *Kidder* teaches this step of Claim 7 in ¶ [0110]. However, the only “programs” discussed in ¶ [0110] are “NMS programs and programs executing on network devices.” *Kidder* says nothing about “launching” these programs “to allow the user to modify the configuration data,” much less implementing such a step with a machine. One skilled in the art would thus understand that only a user could launch these programs to modify configuration data.

The Office Action further alleges that *Kidder* teaches this step of Claim 7 in ¶¶ [0164]–[0165], because “double-clicking the left mouse on a selected module may cause a dialog box to appear and the administrator may modify particular parameters.” However, Claim 7 does not recite that a dialog box is launched. Rather, **Claim 7 recites that a separate “application program” is launched.** One skilled in the art would understand that a dialog box launched within the NMS is different than a separate “application program.” For at least this reason, *Kidder* does not anticipate Claim 7.

Also, **Claim 8** recites “changing the visual appearance of the particular user interface object to indicate . . . that the configuration data . . . has been modified.” The Office Action alleges that *Kidder* discloses this step in ¶ [0219]. However, ¶ [0219] discloses only that the NMS client notifies a network manager of discrepancies between an NMS database and an actual device. *Kidder* says nothing about actually modifying “a particular user interface” that “corresponds to configuration data for [a] functional area.” Nor are *Kidder*’s “discrepancies” the same as “configuration data” that “has been modified.” The Office Action further alleges that *Kidder* discloses this step in ¶ [0158]. However, ¶ [0158] merely recites that the interface may appear differently when a card is present as opposed to when a slot is empty. Thus, ¶ [0158] teaches that **an interface’s appearance differs according to the physical status of a network device, and not in response to modifications in configuration data.** For at least this reason, *Kidder* does not anticipate Claim 8.

Also, **Claim 13** recites “determining for which of the plurality of functional areas the network device and a client have compatible configuration application program interfaces.” The Office Action alleges that *Kidder* discloses this step in ¶ [0110]. However, ¶ [0110] states only

that APIs for the NMS programs and for the programs executing on network devices should be generated “from the same logical system model and associated code generation system.” The Office Action further alleges that *Kidder* anticipates Claim 13 because, as described in ¶ [0097], *Kidder*’s network devices and NMS use a common API. However, just because a network device and a client have a common API, does not mean that *Kidder* describes a step of **“determining for which of the plurality of functional areas the network device and a client have compatible configuration application program interfaces.”**

In fact, there would be no reason for *Kidder*’s NMS clients to determine a plurality of functionality areas for which the network device and a client have compatible configuration application program interfaces. On *Kidder*’s network, the NMS clients and the programs on the network devices **will always have compatible** APIs, by virtue of the fact that the NMS clients and the programs on the network devices were generated “from the same logical system model and associated code generation system.” For at least this reason, *Kidder* does not anticipate Claim 13.

To expedite prosecution in light of the fundamental differences already identified, further arguments for each independently patentable feature of Claims 5–14, 16–25, and 27–36 are not provided at this time. Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

III. CLAIM REJECTIONS BASED ON 35 U.S.C. § 103

A. *Claim 55: Kidder and Cezeaux.*

Claim 55 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Kidder* in view of US 2002/0199184 A1 to Cezeaux (hereinafter “*Cezeaux*”). Applicants traverse the rejection. Reconsideration is respectfully requested.

Claim 55 depends from Claim 4, and includes the above-quoted features of its parent claim by dependency. Thus, the combination of *Kidder* and *Cezeaux* also fails to teach or suggest at least one feature found in Claim 55. Therefore, the combination of *Kidder* and *Cezeaux* does not render obvious Claim 55. Reconsideration of the rejection is respectfully requested.

In addition, Claim 55 recites at least one feature that independently renders it patentable. However, to expedite prosecution in light of the fundamental differences already identified, further arguments for each independently patentable feature of Claim 55 are not provided at this time. Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

B. Claim 57: Kidder and Rider / Sato?

Claim 57 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Kidder in view of US 2002/0120344 A1 to Rider (hereinafter "*Rider*"). Applicants traverse the rejection. Reconsideration is respectfully requested.

The rejection is clearly in error. **US 2002/0120344 A1 is a patent publication by Sato, et al., not Rider.** The subject matter described as being disclosed by *Rider* does not appear to be disclosed at all in US 2002/0120344 A1. Nor do paragraph numbers described as belonging to *Rider* appear on the pages of US 2002/0120344 A1 on which they are described as appearing. Clearly, the Office Action contains a typographical error.

In any case, Applicants submit that Claim 57, as amended, is patentable over all references of record. Applicants respectfully request that the rejection be removed.

IV. ADDED CLAIMS / AMENDMENTS

The added claims and amendments to the claims do not add any new matter to this application. The amendments to are supported by at least the Specification and/or address various informalities. The amendments to the claims were made to improve the readability and clarity of the claims and not necessarily for any reason related to patentability.

Added claims 58–61 correspond to claims 56–57 but are recited in computer-readable storage medium format. Thus, Claims 58–61 do not introduce any new subject matter. Furthermore, Claims 58–61 are patentable over the cited references for the same reasons as described above with respect to Claims 56 and 57.

V. CONCLUSION

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,
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